

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
STEPHANIE BUTLER,	:	
	:	
Debtor.	:	Case No. 19-13308 (MDC)
	:	
	:	Hearing Date: 1/13/22
	:	Time: 9:30 a.m.
	:	900 Market Street #2
	:	Philadelphia, PA 19107

DEBTORS' RESPONSE THE CHAPTER 13 TRUSTEE'S MOTION FOR DISMISSAL

The Debtor, Stephanie Butler, hereinafter referred to as the "Debtor," by and through her counsel, Center City Law Offices, LLC, hereby respectfully files her response to the Chapter 13 Trustee's Motion for Dismissal. For the reasons more fully set forth below, the Debtor submits that there is no basis for the Trustee's Motion.

1. The Debtor avers that she is only two months behind on chapter 13 plan payments.
2. The Debtor should be able to catch up on the above missed payments by the end of January 2022.

WHEREFORE, the Debtor, Stephanie Butler respectfully prays this Honorable Court deny any and all relief requested presently by the Motion of the Trustee.

Respectfully submitted,

CENTER CITY LAW OFFICES, LLC

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Dated: December 28, 2021